

FILED

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

APR - 7 2021

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

ORLANDO WASHINGTON,

Defendant.

No.

**4:21CR00241 RLW/DDN**

**MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Jennifer Szczucinski, Assistant United States Attorneys for said District, and moves the Court to order the Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of the Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, § 3141, et seq.

As and for its grounds, the United States of America states as follows:

1. The Defendant is charged with being a felon in possession of a firearm, in violation of 18 U.S.C. § 922(g), an offense for which a maximum ten years imprisonment is prescribed under Title 18.
2. According to the St. Louis Metropolitan Police Department ("SLMPD"), on December 12, 2020, the Defendant began arguing with another individual in the 1100 block of Washington. The Defendant punched the other individual, after which the other individual shot at the Defendant and the group of people with him. An individual with the Defendant returned fire. Multiple people were shot during the incident, including the Defendant. The Defendant and the group of people with whom he was associated fled the area and drove to Barnes-Jewish Hospital. While the Defendant was being removed from the rear seat of the vehicle in which he arrived, a Glock 22 9mm pistol fell out of his pants. Barnes-Jewish Hospital security personnel observed the pistol fall out of the Defendant's pants. Security personnel seized the pistol and provided it to SLMPD officers when they arrived. An additional search of

the vehicle in which the Defendant arrived located: 1) magazine loaded with 17 rounds of ammunition; 2) a DPMS Panther Arms .223 caliber rifle; 3) a SCCY 9mm pistol; 4) a Taurus .40 caliber pistol; 5) a magazine loaded with five rounds of ammunition; and 6) a shell casing located on the rear floorboard. Further, there is evidence that the Defendant fired the Glock 22 firearm at least two times during the incident. Specifically, analysis of the Glock 22 firearm and ballistic cartridge casings at the scene and in the vehicle in which the Defendant was transported to the hospital reflect that a ballistic cartridge case found in the 1100 block of Washington and a ballistic cartridge case found in the vehicle in which the Defendant was transported to the hospital were fired from the Glock 22 firearm.

3. The Defendant's criminal history reflects that he has multiple felony convictions including, but not limited to, the following:

- 1222-CR00705, *State of Missouri v. Orlando Washington*  
Guilty Plea/Sentence Date: April 16, 2013  
Count One: Unlawful Use of a Weapon  
Sentence: SIS, 2 years probation
- 1822-CR01840, *State of Missouri v. Orlando Washington*  
Guilty Plea/Sentence Date: January 28, 2019/February 14, 2019  
Count One: Unlawful Use of a Weapon – Exhibiting  
Count Two: Resisting Arrest  
Sentence: 3 years MDC

4. The Defendant is still on parole for his conviction in Cause No. 1822-CR01840.

5. There is a serious risk that the Defendant will flee, given the Defendant's history of flight from law enforcement, his failure to comply with supervision while on parole, and the potential sentence the Defendant faces in this case.

6. The Defendant's criminal history and the nature and circumstances of the offense charged, reflect that there is a serious danger to the community that would be posed by the defendant's release. Further, there are no conditions or combination of conditions that will reasonably assure the Defendant's appearance as required.

WHEREFORE, the United States requests this Court to order the Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of the Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

/s/ Jennifer Szczucinski  
JENNIFER SZCZUCINSKI, #56906MO  
Assistant United States Attorney